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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**PACIFIC GULF SHIPPING CO.,**

Plaintiff,

vs.

**ADAMASTOS SHIPPING & TRADING  
S.A., VIGOROUS SHIPPING &  
TRADING S.A., BLUE WALL  
SHIPPING LTD., and PHOENIX  
SHIPPING & TRADING S.A.**

Defendants.

No. 3:18-CV-02076-MO

Admiralty

**PLAINTIFF PACIFIC GULF SHIPPING  
CO.'S DISCOVERY PLAN PROPOAL**

COMES NOW, Plaintiff Pacific Gulf Shipping Co. ("Plaintiff") by and through its undersigned counsel and submits the following proposed plan for expedited discovery:

1. Plaintiff to serve Requests for Production by Friday, December 14, 2018. A copy of proposed requests for production are enclosed hereto as Exhibit 1.

2. Plaintiff to serve First Set of Interrogatories by Friday, December 14, 2018. A copy of proposed interrogatories are enclosed hereto as Exhibit 2.

3. Responses to Plaintiff's First Requests for Production and First Set of Interrogatories to be served on or before Friday December 28, 2018.

4. Plaintiff to serve subpoena(s) on the insurance underwriters who hold entry for the M/V ADAMASTOS and the M/V VIGOROUS on or before Monday December 17, 2018.

5. Depositions of the following individuals to proceed in Greece during the week of January 7-11, 2019,<sup>1</sup> with exact dates, times, and locations to be agreed by counsel:

- A. George Gourdomichalis;
- B. Efstahios Gourdomichalis;
- C. Corporate representative of Vigorous Shipping & Trading S.A.;
- D. Corporate representative of Phoenix Shipping & Trading S.A.;
- E. Corporate representative of Blue Wall Shipping Ltd.

6. Plaintiff respectfully reserves the right to request leave of the Court to seek additional written discovery and/or depositions.

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<sup>1</sup> Subject to the receipt of a full and complete production and responses by Friday, December 28, 2018. Plaintiff respectfully reserves the right to seek leave of the Court to file a motion to compel and/or continue the depositions in the event the discovery responses are incomplete and/or inadequate.

Dated this 13<sup>th</sup> day of December 2018.

Respectfully submitted,

CHALOS & CO, P.C.

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